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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 COREY BROWN,
15 Defendant.

Case No. 2:18-cr-00089-RFB-VCF

STIPULATION TO MODIFY
CONDITIONS OF RELEASE
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Chris Burton,
18 Assistant United States Attorney, counsel for the United States of America, and Heidi A. Ojeda,
19 Assistant Federal Public Defender, counsel for Corey Brown, that the Court modify his
20 conditions of release.

21 The Stipulation is entered into for the following reasons:

22 1. On July 7, 2017, the Court ordered Mr. Brown's release on a personal
23 recognizance bond with certain conditions, including a travel restriction to the State of Nevada.
24 ECF No. 5.

25 2. Mr. Brown and his family want to take a family vacation to Hawaii to celebrate
26 his brother's college graduation. The family plan to travel at the end of April 2021. The Court

1 previously granted Mr. Brown permission to travel to Hawaii (ECF No. 84), but due to the
2 COVID-19 pandemic, he was not able to travel.

3 3. Counsel has spoken with Pretrial Services concerning this issue. Pretrial
4 Services confirmed that Mr. Brown has been compliant with the terms of his release and has no
5 opposition to his travel. Pretrial services requests this Court issue another order allowing Mr.
6 Brown's travel to Hawaii (out of an abundance of caution) given the length of time that has
7 passed.

8 4. The government has no objection to this requested modification so long as Mr.
9 Brown provides Pretrial Services with his itinerary as soon as possible before his travel, follows
10 all COVID-19 related procedures and precautions and he reports to Pretrial Services within 24
11 hours of his return and submits to a drug test.

12 This is the second stipulation to modify conditions of release filed herein.

13 DATED this 7th day of April 2021.

14 RENE L. VALLADARES
15 Federal Public Defender

Christopher Chiou
Acting United States Attorney

16 By /s/ Heidi A. Ojeda

By /s/ Chris Burton

17 HEIDI A. OJEDA
18 Assistant Federal Public Defender

CHRIS BURTON
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 COREY BROWN,

7 Defendant.

Case No. 2:18-cr-00089-RFB-VCF

ORDER

9
10 IT IS THEREFORE ORDERED that Mr. Brown's condition of release be modified to
11 allow for Mr. Brown to travel outside the State of Nevada to Hawaii. Mr. Brown is ordered to
12 comply with all COVID-19 related procedures and policies concerning out-of-state travel.

13
14 IT IS FURTHER ORDERED that Mr. Brown provide his travel itinerary, including
15 flights and the location where he will be staying, as soon as possible prior to his travel.

16
17 IT IS FURTHER ORDERED that Mr. Brown contacted Pretrial Services within 24
18 hours of his return from Hawaii and submit to a drug test upon his return.

19
20 DATED this 7th day of April 2021.

21 

22 RICHARD F. BOULWARE, II
23 UNITED STATES DISTRICT JUDGE
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